1 ARIAS SANGUINETTI WANG & TORRIJOS, LLP Gregg A. Hubley, Esq. **FILED** 2 Nevada Bar No. 7386 RECEIVED **ENTERED** 7030 Smoke Ranch Road, Suite B SERVED ON 3 COUNSEL/PARTIES OF RECORD Las Vegas, NV 89128 Tel: (702) 789-7529 | Fax: (702) 909-7865 4 MAR 2 1 2018 E-mail: gregg@aswtlawyers.com 5 **SAVIN & BURSK** CLERK US DISTRICT COURT 6 Adam J. Savin, Esq. (Pro Hac Vice Pending) DISTRICT OF NEVADA BY: California Bar No. 274899 DEPUTY E-mail: aisavin@savinbursklaw.com 17337 Ventura Blvd., Suite 200 8 Encino, California 91316 Tel: (818) 368-8646 | Fax: (818) 960-0011 Attorneys for Plaintiff Sean McManmon and Estate of Suzanne D. McManmon 10 UNITED STATES DISTRICT COURT 11 DISTRICT OF NEVADA 12 Case No.: 3:18-cv-00056-RCJ-VPC SEAN MCMANMON, Individually; SEAN 13 MCMANMON, as Administrator of the Estate ORDER of SUZANNE D. MCMANMON, Deceased, 14 15 Plaintiff. 16 VS. 17 G.D. EASTLICK, INC., a Montana corporation; EDWARD CHARLES JOBE, an 18 individual: DOES I-X, and ROE 19 CORPORATIONS I –X, inclusive, 20 Defendants. 21 FIRST MOTION FOR EXTENSION OF TIME TO COMPLY WITH LOCAL RULE 1A 11-22

FIRST MOTION FOR EXTENSION OF TIME TO COMPLY WITH LOCAL RULE 1A 11 2, FOR COUNSEL ADAM J. SAVIN, ESO.

COMES NOW, Plaintiff SEAN MCMANMON, both individually and as husband and Administrator of the Estate of SUZANNE D. MCMANMON, deceased, by and through his attorneys of record, Gregg A. Hubley, Esq. of Arias Sanguinetti Wang & Torrijos and hereby submits his First Motion for Extension of Time to Comply with Local Rule IA 11-2, for Counsel, Adam J. Savin, Esq. This motion is supported by the accompanying memorandum of points and authorities, the pleadings and papers

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already on file, and any other arguments presented to this Court at or before the hearing on the motion, 1 if any. 2 Dated this day of March, 2018. 3 ARIAS SANGUINETTI WANG & 4 TORRIJOS, LA 5 6 By: 7 Nevada Bar No. 7386 7030 Smøke Ranch Road, Suite B 8 Las Vegas, Nevada 89128 9 -and-10 **SAVIN & BURSK** 11 Adam J. Savin, Esq. (Pro Hac Vice Pending) California Bar No. 274899 12 E-mail: ajsavin@savinbursklaw.com 13 17337 Ventura Blvd., Suite 200 Encino, California 91316 14 Attorneys for Plaintiff Sean McManmon and 15 Estate of Suzanne D. McManmon 16 MEMORANDUM OF POINTS AND AUTHORITIES 17 Pursuant to Local Rule IA 6-1, this is Plaintiff's first request for a two-week extension of time 18 in order for applicant, Adam J. Savin, Esq., to comply with Local Rule IA 11-2. The deadline to comply 19 with Local Rule IA 11-2, is currently March 18, 2018 per ECF DOC. 3. 20 The deadline to comply with Local Rule IA 11-2, was inadvertently miscalendared and was 21 just recently brought to Mr. Savin's attention. Adam J. Savin, has requested his Certificates of Good 22 Standing from the California State Bar. However, he does not believe that he will receive the Certificate 23 in time to meet the March 18, 2018, deadline. Therefore, Plaintiff respectfully requests a two-week 24 extension to comply with the Local Rule and file his Verified Petition for Pro Hac Vice admission. 25 26 111 111 27 28 111

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CONCLUSION

Based on the foregoing, Plaintiff respectfully requests this Court grant his First Motion for Extension of Time to Comply with Local Rule IA 11-2, for Counsel, Adam J. Savin, Esq., and allow the Plaintiff and Mr. Savin an additional two (2) week period within which to comply with Local Rule IA 11-2.

ARIAS SANGEINETTI WANG & TORRIJOS, LLP

Bv:

GREGG A. HUBLEY, ESQ.

Nevada Bar Nd. 7386 7030 Smoke Ranch Road, Suite B Las Vegas, Nevada 89128

-and-

SAVIN & BURSK

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17337 Ventura Blvd., Suite 200 Encino, California 91316

Attorneys for Plaintiff Sean McManmon and Estate of Suzanne D. McManmon

ORDER

IT IS SO ORDERED:

DATED: MOLCY 11, 2018

UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I am employed in the County of Clark, State of Nevada, am over the age of 18 years and not a party to this action. My business address is that of Arias Sanguinetti Wang & Torrijos, LLP, 7030 Smoke Ranch Road, Ste. B, Las Vegas, Nevada 89128.

I HEREBY CERTIFY that on this day, I electronically filed the <u>FIRST MOTION FOR</u>

<u>EXTENSION OF TIME TO COMPLY WITH LOCAL RULE IA 11-2, FOR COUNSEL ADAM</u>

<u>J. SAVIN, ESO.</u> with the Clerk of Court using the CM/ECF system for filing and transmittal of Notice of Electronic Filing to all parties and counsel identified on the Court generated Electronic Filing.

I certify under penalty of perjury that the foregoing is true and correct and that this Certificate of Service was executed by me on the day of March, 2018 at Las Vegas, Nevada.

An Employee of Arias Sanguinetti Wang & Torrijos, LLP